

1 THE HONORABLE BARBARA J. ROTHSTEIN  
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6 **UNITED STATES DISTRICT COURT**  
7 **WESTERN DISTRICT OF WASHINGTON**

8 VEERA DARUWALLA, MICHAEL MARCH,  
9 and LAVICIEIA STURDIVANT, individually and  
10 on behalf of classes of similarly situated  
individuals,

11 Plaintiffs,

12 v.

13 T-MOBILE USA, INC.,

14 Defendant.

15 No. 2:21-cv-1118-BJR

16 **STIPULATION AND ORDER TO**  
17 **EXTEND TIME TO ANSWER**  
18 **COMPLAINT**

19 Under Western District of Washington Local Rules 7(d)(1) and 10(g), Plaintiffs Veera  
20 Daruwalla, Michael March, and Lavicieia Sturdivant and Defendant T-Mobile USA, Inc., (the  
21 “Parties”) stipulate that T-Mobile’s deadline to answer or otherwise to respond to the Complaint,  
22 currently set for October 15, 2021, shall be extended pending the Court’s ruling on T-Mobile’s  
23 pending motion to stay proceedings, ECF No. 31. If the motion is denied, T-Mobile’s deadline to  
24 answer or otherwise respond to the Complaint shall be 30 days after the denial of the motion. If  
the Court grants the motion to stay, any deadline will be set following resolution of the motion to  
transfer pending before the Judicial Panel on Multidistrict Litigation (“JPML”).

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28 **STIPULATION AND ORDER TO EXTEND TIME**  
29 **TO ANSWER**  
(NO. 2:21-CV-1118-BJR) - 1

30 154261683.1

31 Perkins Coie LLP  
32 1201 Third Avenue, Suite 4900  
33 Seattle, Washington 98101-3099  
34 Phone: 206.359.8000  
35 Fax: 206.359.9000

Good cause exists for this extension because Plaintiffs filed a motion with the JPML to transfer all cases related to an August 2021 data-security incident for coordinated or consolidated pretrial proceedings under 28 U.S.C. § 1407. See *In re T-Mobile Customer Data Sec. Breach Litig.*, MDL Docket No. 3019 (J.P.M.L. filed Aug. 23, 2021) (ECF No. 1). Plaintiffs, T-Mobile, and plaintiffs in related cases have noticed numerous cases as related that should be transferred. See *id.* (ECF Nos. 2, 8-1, 11, 20, 48, 62, 65). The extension will conserve judicial resources by potentially avoiding motion practice that may ultimately turn out to be unnecessary depending on how the litigation develops and progresses in light of anticipated consolidation into an MDL.

Dated: October 14, 2021

By: /s/ Steve Y. Koh

Steve Y. Koh, WSBA No. 23284

Kathleen M. O'Sullivan, WSBA No. 27850

Lauren J. Tsuji, WSBA No. 55839

PERKINS COIE LLP

1201 Third Avenue, Suite 4900

Seattle, WA 98101-3099

Telephone: 206.359.8000

Faxsimile: 206.359.9000

E-mail: SKoh@perkinscoie.com

KOSullivan@perkinscoie.com

L.Tsuij@perkinscoie.com

Kristine McAlister Brown (*pro hac vice*)

ALSTON & BIRD LLP

1201 West Peachtree Street

Atlanta, GA 30309

Telephone: (404) 881-7000

Faxsimile: (404) 881-7777

E-mail: kristy.brown@alston.com

*Attorneys for Defendant T-Mobile USA, Inc.*

**STIPULATION AND ORDER TO EXTEND TIME  
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**Perkins Coie LLP**  
1201 Third Avenue, Suite 4900  
Seattle, Washington 98101-3099  
Phone: 206.359.8000  
Fax: 206.359.9000



1 James Pizzirusso (*pro hac vice*)  
2 **HAUSFELD LLP**  
3 888 16<sup>th</sup> Street N.W., Suite 300  
4 Washington, DC 20006  
5 Telephone: (202) 540-7200  
6 E-Mail: jpizzirusso@hausfeld.com

7 Steven M. Nathan (*pro hac vice*)  
8 **HAUSFELD LLP**  
9 33 Whitehall St., 14<sup>th</sup> Floor  
10 New York, NY 10004  
11 Telephone: (646) 357-1100  
12 E-Mail: snathan@hausfeld.com

13 *Attorneys for Plaintiffs*

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2                   **ORDER**

3                   IT IS SO ORDERED.

4                   Dated this 14th day of October 2021.

5                   s/Barbara J. Rothstein  
6                   Barbara J. Rothstein  
7                   U.S. District Court Judge

8                   Presented by:

9                   /s/ Steve Y. Koh

10                  Steve Y. Koh, WSBA No. 23284  
11                  Kathleen M. O'Sullivan, WSBA No. 27850  
12                  Lauren J. Tsuji, WSBA No. 55839

13                  **PERKINS COIE LLP**

14                  1201 Third Avenue, Suite 4900  
15                  Seattle, WA 98101-3099  
16                  Telephone: 206.359.8000  
17                  Facsimile: 206.359.9000  
18                  E-mail: SKoh@perkinscoie.com  
19                  KOSullivan@perkinscoie.com  
20                  LTsuji@perkinscoie.com

21                  Kristine McAlister Brown (*pro hac vice*)

22                  **ALSTON & BIRD LLP**  
23                  1201 West Peachtree Street  
24                  Atlanta, GA 30309  
25                  Telephone: (404) 881-7000  
26                  Facsimile: (404) 881-7777  
27                  E-mail: kristy.brown@alston.com

28                  *Attorneys for Defendant T-Mobile USA, Inc.*

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